



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

DEC 27 2018

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Article Number: 7015 0920 0000 8689 2014

Mrs. Irma López
Executive Director
Environmental Compliance, Health, and Occupational Safety
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan, Puerto Rico 00916-7066

**Re: Reconnaissance Inspection
Guanica Wastewater Treatment Plant
NPDES Permit Number PR0020486**

Dear Ms. López:

On December 19, 2018, the United States Environmental Protection Agency (EPA) conducted a Reconnaissance Inspection (RI) at the above referenced Puerto Rico Aqueduct and Sewer Authority's (PRASA) Wastewater Treatment Plant (WWTP) located in Guanica, Puerto Rico. The RI was conducted pursuant to the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. § 1251 et seq., 40 CFR § 122.41(a)(2), & 1, 2, 3, and in accordance with Agency wide acceptable guidance and procedures. PRASA was represented by Amalio Quiros and Edgardo Jorge, Plant Operators.

Enclosed you will find the inspection report. The RI report indicates the noncompliance items or deficiencies which should be corrected to ensure compliance with the Clean Water Act and the National Pollutant Discharge Elimination System ("NPDES") Permit. There are also certain areas of concern which are items that could be improved for better operation of the facility. Within ninety (90) calendar days of receipt of this letter, please respond with the actions that PRASA has taken or will take to address the deficiencies included in the attached Water Compliance Inspection Report.

Should you have any questions feel free to contact Miguel A. Batista, Environmental Engineer, at (787) 977-5823.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jaime A. Geliga", is written over the typed name.

Jaime A. Geliga, Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

Enclosure

cc. Annette Feliberty, EQB (w/Enclosures)
Hector Gierbolini, PRASA

NPDES Inspection Report

RECONNAISSANCE INSPECTION

Facility Name: Guanica WWTP
NPDES Permit Number: PR0020486
Permit Status: Active (Expiration Date: 01/31/2023)
PRASA representative: Amalio Quiros, Plant Operator
Edgardo Jorge, Plant Operator
EPA Inspector: Miguel A. Batista, Environmental Engineer

I. BACKGROUND

A Reconnaissance Inspection (RI) was conducted on December 19, 2018 at the Guanica WWTP. The RI consisted of an opening interview to discuss the purpose of the inspection and information request about the facility. During the visit we did a site tour to overview operational conditions and to obtain a grab sample of the effluent to describe its appearance.

II. FACILITY DESCRIPTION AND OPERATOR'S LICENCE STATUS

The Guanica WWTP is a secondary treatment plant. The facility consists of two treatment modules. One module is a 0.5 MGD activated sludge conventional package plant (Old Plant), and the second module is a 1.25 MGD Biological Nutrient Removal (BNR) treatment plant (New Plant). The New Plant was in service. The Old Plant was out of service.

At the time of the inspection, Amalio Quiros and Edgardo Jorge were acting as Plant Operators for the Guanica WWTP. Mr. Quiros has obtained the certification as a WWTP Operator Level IV, license # 2099, which expires on April 21, 2020. Mr. Jorge has obtained the certification as a WWTP Operator Level IV, license # 2932, which expires on May 22, 2020.

III. COMPLIANCE STATUS WITH CONSENT DECREE (CD)

As part of the Preventive Maintenance Program (PMP) minimum requirements required by the CD (CD 3:15-cv-02283-JAG, signed on September 15, 2015), the Guanica WWTP is implementing the program (Appendix U) with some deficiencies.

IV. INSPECTION FINDINGS

A. Equipment unit identified in poor operational conditions or not in service at the time of the EPA's CEI (June 11, 2018) are summarized in the following table:

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the RI on 12/19/2018
1. Motor-Blower # 1 (old plant) (1116116)	04/20/2018	3847	Malfunction.	Not corrected.
2. Motor-Blower # 3 (old plant) (208951)	06/09/2017	10469926	Got tripped.	Not corrected.
3. Motor-Blower # 2 (old plant) (208952)	06/03/2018	38859	Got tripped.	Corrected on 06/29/2018.
4. Control Panel PP1 (MDP) (1112479)	04/26/2018	10518970	Working on automatic mode.	Not corrected.
5. A/C Lab. Building (1133669)	05/23/2018	38851	Lack of gas.	Corrected on 08/12/2018.
6. Booster Pump Potable Cl2 (1133665)	01/12/2018	38823	Malfunction.	Not corrected.
7. Exhaust Fan Chlorine Room (11124753)	04/25/2018	38849	Malfunction.	Not corrected.
8. Pump/Motor NPW # 2 (1120889)	01/23/2017	10481657	Air accumulation.	Corrected on 07/24/2018.
9. Pump/Motor NPW # 1 (1136537)	03/25/2017	10453999	Malfunction.	Not corrected.
10. NPW Pumps Panel (1114177)	06/03/2018	38860	Malfunction.	Not corrected.
11. Pump/Motor Degritter # 1 (208765)	12/18/2017	10330755	Malfunction.	Not corrected.
12. Pump/Motor Degritter # 2 (208766)	05/29/2017	10455402	Malfunction.	Not corrected.
13. Conveyor Degritters (209331)	06/29/2017	10471396	Corrosion	Not corrected.

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the RI on 12/19/2018
14. Sum Pump Influent Wet Well Original 2 (1104906)	06/03/2018	38859	Got tripped.	Corrected on 06/24/2018.
15. Sum Pump Influent Wet Well Original 3 (1105306)	05/26/2018	38856	Malfunction.	Not corrected.
16. Sum Pump Influent Wet Well Original 3 (1105304)	05/16/2018	38852	Got tripped.	Not corrected.
17. Filter Press (1107285)	05/18/2018	10453012	Oil leak.	Not corrected.
18. Filter Press Control Panel (1115971)	03/16/2017 08/25/2017	10457848 10484730	Malfunction. Wrong reading.	Corrected on 07/03/2018.
19. BNR Clarifier # 1 (No SAP #)	10/30/2015	10366548	Short-circuit.	Not corrected.
20. Clarifier # 1 – Arm (209653)	03/04/2017	10368441	Broken rubber.	Not corrected.
21. Clarifier # 2 (No SAP #)	05/13/2015	10371891	Short-circuit.	Not corrected.
22. Clarifier # 2 – Arm's Transmission (209654)	03/04/2016	10381900	Broken rubber.	Not corrected.
23. Influent Flow Meter BNR (1121292)	07/20/2017	10478070	Wrong reading.	Not corrected.
24. Sum Pump Equalization Tank # 2 (208446)	04/18/2018	38842	Malfunction.	Not corrected.
25. Mixer BNR Anaerobic # 2 (1135006)	05/26/2018	38853	Got burned.	Corrected on 05/23/2018.
26. Blower BNR # 1 (1104338)	12/18/2017 09/02/2017	38803 10488484	Malfunction. Oil leak.	Not corrected.

Equipment Unit (SAP #)	Date Reported Out of service	Work Order #	Type of Failure	Status at the time of the RI on 12/19/2018
27. Blower BNR # 2 (208945)	12/18/2017	38804	Malfunction.	Not corrected.
	09/02/2018	10450495	Oil leak.	
28. Motor-Blower EQ # 2 (208949)	06/09/2017	10399438	Pulley/oil leak.	Not corrected.
	12/18/2017	38807	Malfunction.	
29. Pump/Motor Recirculation BNR # 2 (1134626)	05/18/2018	38843	Screws.	Not corrected.
30. Flow meter SLA (old plant) (No SAP #)	05/20/2017	10467265	Failure.	Not corrected.
31. Drainage valve # 1 (No SAP #)	03/16/2017	10381905	Malfunction.	Not corrected.
32. Waste Discharge Valve BNR (No SAP #)	05/31/2017	10467839	Adjustment.	Not corrected.
33. Dry Pit Valve (No SAP #)	07/17/2017	10475366	Malfunction.	Not corrected.
34. Illumination pole (No SAP #)	07/15/2017	10476238	Improper positioning.	Not corrected.
35. Air pipe SLA (No SAP #)	01/26/2017	10440643	Malfunction.	Not corrected.
36. Chlorine contact chamber # 1 (No SAP #)	08/20/2017	10483297	Adjustment.	Not corrected.
37. Chlorine contact chamber # 2 (No SAP #)	08/20/2017	10483334	Adjustment.	Not corrected.
38. Influent Pump # 1 (old plant) (133810)	12/12/2017	38857	Malfunction.	Corrected on 06/24/2018.
39. Blower BNR # 3 (208946)	-----	38805	-----	Not corrected.
40. Recirculation Pump BNR # 1 (1134629)	-----	-----	-----	Corrected on 06/26/2018.

B. Other Observations:

1. There was no internet access to verify status on work orders for equipment/unit in malfunction or out of service.

V. SAMPLING

The effluent sample was evaluated at the discharge point (Point 001) for the parameters shown below at the time of the inspection: (please indicate if present)

Effluent Grab Sample Results	
Color	Not observed
Grease	Not observed
Oil Sheen	Not observed
Foam	Not observed
Floatable Solids	Not observed
Turbidity *	Not observed

* Based on observations, it's not a quantitative measure.

VI. CONCLUSION

The inspection revealed that several process units were out of service or under repair. Please note that **Part 5 of Attachment B: Standard Conditions** of the permit requires the permittee to properly operate and maintain all facilities and systems for collection and treatment (and related appurtenances) which are installed or used to achieve compliance. The sample taken during the inspection was in compliance with the permit's daily limitation parameters for pH, Temperature, Residual Chlorine, and Dissolved Oxygen.

PRASA must submit a compliance plan in order to correct the deficiencies notes above on Section III.



INSPECTOR SIGNATURE

12/27/2018
DATE



SUPERVISOR SIGNATURE

12/27/18
DATE